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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

CHRIS YOUNG YOO,

Defendant.

NO. **CR17-075 TS2**  
INFORMATION  
(Felony)

The United States Attorney charges that:

**COUNT ONE**  
**Wire Fraud**

At all times relevant to this Information:

**A. Background**

1. CHRIS YOUNG YOO was a Bellevue, Washington-based investment advisor and a resident of Bellevue and Medina, Washington. YOO was the majority owner and the Chief Executive Officer of Summit Asset Strategies, LLC ("SAS"), and the managing principal of two related companies—Summit Asset Strategies Investment Management ("SASIM") and Summit Asset Strategies Wealth Management ("SASWM").

1           2.     YOO administered investment funds, including Summit Stable Value Fund  
2 (“SSVF”) and Summit Strategic Opportunities Fund I (“SSOF”), which served as  
3 investment vehicles for clients of SASIM and SASWM. The SSVF and SSOF funds  
4 invested in foreign and domestic debt and equity, with a focus on investments in South  
5 Korea.

6           3.     YOO raised capital for SSFV and SSOF by offering investors promissory  
7 notes (in the case of SSVF) or equity interests (in the case of SSOF) issued by those  
8 entities. The offering materials for these investments stated that investor funds would be  
9 deposited into a trust account overseen by a third-party custodian, and then invested in  
10 debt and equity investments through the respective fund. In the case of SSVF, the  
11 offering materials stated that the fund would pay each noteholder a fixed interest rate, and  
12 would return the noteholder’s principal at the end of the term. The materials provided  
13 that SASIM would manage the funds and would be compensated for doing so through a  
14 management fee.

15 **B.     The Scheme to Defraud**

16           4.     Beginning in or about 2006, and continuing until about November 24,  
17 2015, at Bellevue, within the Western District of Washington, CHRIS YOUNG YOO  
18 devised and intended to devise a scheme and artifice to defraud and to obtain money and  
19 property by means of materially false and fraudulent pretenses, representations and  
20 promises.

21           5.     It was the essence of the scheme and artifice to defraud that YOO  
22 represented to certain prospective investors that, if they entrusted him with their money,  
23 he would invest the funds in SASIM investment vehicles such as SSVF or SSOF, when in  
24 fact, YOO intended to use, and did use, the investors’ funds for his own purposes,  
25 including paying his own personal expenses, supporting his businesses, and making  
26 interest payments to other defrauded investors to conceal the fact that YOO had not  
27 invested their funds as promised.

1 **C. Manner and Means**

2 6. It was part of the scheme and artifice to defraud that YOO identified certain  
3 prospective investors that placed a high degree of trust in YOO (the "Ponzi Victims").  
4 YOO solicited investments from the Ponzi Victims by telling them that he would invest  
5 their money in SASIM investment vehicles, which in turn would invest their money in  
6 equity and debt investments. In fact, YOO had no intention of investing these funds in  
7 legitimate investments, but instead intended to use the money for his own purposes.

8 7. It was part of the scheme and artifice to defraud that YOO opened a secret  
9 bank account (the "Ponzi Account") for the purpose of orchestrating his scheme. After  
10 soliciting investments from the Ponzi Victims, YOO secretly deposited the investment  
11 proceeds into the Ponzi Account instead of into the trust accounts associated with the  
12 investment vehicles. Unbeknownst to the investors, YOO then dispersed the investment  
13 proceeds to other bank accounts, including his personal bank account, Summit Asset  
14 Strategies business accounts YOO controlled, and the bank accounts of other Ponzi  
15 Victims as payments became due to them.

16 8. It was part of the scheme and artifice to defraud that YOO prepared and  
17 provided to the Ponzi Victims fraudulent account statements on which YOO represented  
18 that the victims owned investments in Summit investment vehicles when, as YOO well  
19 knew, their money had not been invested in these vehicles.

20 9. It was part of the scheme and artifice to defraud that, during an  
21 investigation by the Securities and Exchange Commission ("SEC") into YOO's  
22 investment companies, YOO provided the SEC with a financial statement on which he  
23 fraudulently failed to disclose that he had deposited investor funds into the Ponzi  
24 Account.

25 10. As a result of the scheme and artifice to defraud, YOO caused losses to  
26 Ponzi Victims of approximately \$3,500,000.

**D. Execution of the Scheme to Defraud**

11. On or about April 16, 2015, for the purpose of executing and attempting to execute the scheme and artifice to defraud, CHRIS YOUNG YOO did knowingly transmit and cause to be transmitted by wire communication in interstate and foreign commerce, signs, signals, pictures and sounds, in that CHRIS YOUNG YOO caused an interstate wire transmission from New York to Washington State to effect the deposit of a \$150,000 check from a Ponzi Victim into the Ponzi Account.

All in violation of Title 18, United States Code, Section 1343 and Section 2.

**COUNT 2**

**(False Statement to the United States)**

On or about May 15, 2015, at Bellevue, within the Western District of Washington, and elsewhere, the defendant, CHRIS YOUNG YOO, did willfully and knowingly make, and cause to be made, a materially false, fictitious, and fraudulent statement in a matter within the jurisdiction of the Securities and Exchange Commission, an agency of the United States. Specifically, CHRIS YOUNG YOO represented on a financial statement submitted to the Securities and Exchange Commission that the Ponzi Account, as described in Paragraph 7 of this Information, was a trust account that CHRIS YOUNG YOO had used in connection with loans he received from family members, when, as CHRIS YOUNG YOO then and there knew, the Ponzi Account was used not

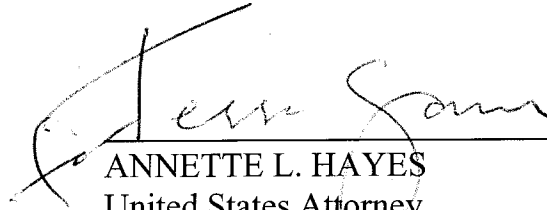
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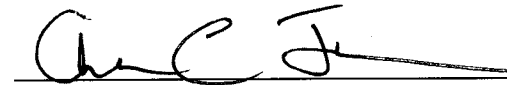
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1 for the purposes he described, but instead as a vehicle to receive fraudulently-collected  
2 investor funds.

3 All in violation of Title 18, United States Code, Section 1001(a)(2) and Section 2.

4 DATED: March 13, 2017

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